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11 *Attorneys for Defendants*
12 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 BRENNNA SCHRADER, an individual, on
16 behalf of herself and all others similarly
17 situated,

18 Plaintiff,

19 vs.

20 STEPHEN ALAN WYNN; an individual;
21 MAURICE WOODEN, an individual, WYNN
22 LAS VEGAS, LLC dba WYNN LAS VEGAS
23 a Nevada Limited Liability, WYNN
24 RESORTS, LTD, a Nevada Limited Liability
25 Company; and DOES 1-20, inclusive; ROE
26 CORPORATIONS 1-20, inclusive,

27 Defendants.

28 Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS TO:**

- (1) FILE REPLIES IN SUPPORT OF
THEIR RESPECTIVE MOTIONS
TO DISMISS (Fourth Request); AND**
- (2) FILE REPLIES IN SUPPORT OF
THEIR RESPECTIVE MOTIONS
TO CONTINUE STAY OF
DISCOVERY (Fourth Request)**

29 IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”),
30 through her counsel Richard Harris Law Firm, Defendants Wynn Las Vegas, LLC (“WLV”) and
31 Wynn Resorts, Ltd. (“WRL”), through their counsel Jackson Lewis P.C., Defendant Stephen Alan
32 Wynn, through his counsel Peterson Baker, PLLC, and Defendant Maurice Wooden, by and
33 through his counsel Kennedy & Couvillier, that the Defendants shall have up to and including **July**
34 **16, 2021**, in which to file their respective replies in support of their respective Motions to Dismiss
35 and Motions to Continue Stay of Discovery.

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1 This Stipulation is submitted and based upon the following:

2 1. On May 11, 2020, the Court entered an Order granting Defendants' Motion for Stay
3 of Discovery. ECF No. 57.

4 2. On February 17, 2021, the Court entered an Order that, among other things, granted,
5 in part, Plaintiff's Motion for Leave to File her First Amended Complaint with respect to certain
6 claims. ECF No. 89. Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First
7 Amended Complaint on February 17, 2021. ECF No. 90.

8 3. The May 11, 2020 Order effectively provided that the parties are to file a joint
9 proposed discovery plan and scheduling order within 14 days after the Court's order resolving
10 Defendants' then-pending motions to dismiss, which was March 3, 2021.

11 4. Defendants Wooden and Stephen A. Wynn filed their respective Motions to Dismiss
12 on March 31, 2021. ECF No. 98 (Wooden) and No. 99 (SAW). Defendants WRL and WLV filed
13 their Motion for Partial Dismiss (ECF No. 103) and respective answers on April 7, 2021 (ECF No.
14 104 (WLV) and No. 105 (WRL)). Defendants WRL, WLV and SAW also filed Motions to Continue
15 Stay of Discovery that same day. ECF No. 101 (SAW), No. 106 (WLV and WRL). Defendant
16 Wooden filed a joinder to Defendant's SAW's Motion to Continue Stay. ECF No. 102.

17 5. On April 21, 2021, the Parties stipulated to extend the time for Plaintiff to respond
18 Defendants' Motions to May 24, 2021. ECF Nos. 110 and 111. The Parties also agreed that
19 Defendants' respective replies would be due on June 14, 2021. *Id.* The Court entered an order
20 approving the Stipulation on April 23, 2021. ECF Nos. 112 and 113.

21 6. On May 20, 2021, the Parties stipulated to extend the time for Plaintiff to respond
22 Defendants' Motions to June 7, 2021. ECF Nos. 114 and 115. The Parties also agreed that
23 Defendants' respective replies would be due on July 5, 2021. *Id.* The Court entered an order
24 approving the Stipulation on May 24, 2021. ECF Nos. 116 and 117.

25 7. On June 7, 2021, the Parties stipulated to extend the time for Plaintiff to respond
26 Defendants' Motions to June 9, 2021. ECF Nos. 118 and 119. The Parties also agreed that
27 Defendants' respective replies would be due on July 7, 2021. *Id.* The Court entered an order
28 approving the Stipulation on June 9, 2021. ECF No. 120.

1 8. Plaintiff filed her responses to Defendants' respective Motions on June 9, 2021. ECF
2 Nos. 121-123.

3 9. Subsequently, Defendants WLV and WRL have determined they need additional
4 time to finalize their respective replies in support of their respective Motions to Dismiss and
5 Motions to Continue Stay of Discovery (and joinder thereto) in light of the upcoming Fourth of
6 July holiday and the office closures of Defendants' respective counsel. As such, the Parties have
7 agreed that Defendants shall have up to and including July 16, 2021 to file their respective replies.

8 10. This is the fourth request for an extension of time for Defendants to file their
9 respective replies in support of their Motions to Dismiss Plaintiff's First Amended Complaint and
10 Motions to Continue the Discovery Stay, and is made in good faith and not for the purpose of delay.

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1 11. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim or defense held by any party.

3 Dated this 1st day of July, 2021.

4 RICHARD HARRIS LAW FIRM

5 /s/ Burke Huber

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6 *Attorney for Defendant*
7 *Stephen Alan Wynn*

1 **ORDER**

2 IT IS SO ORDERED:

3 

4 United States District Court/Magistrate Judge

5 Dated: July 6, 2021.

6 4827-6424-6512, v. 1